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Filing date: **12/30/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91216349
Party	Plaintiff Los Angeles Dodgers LLC
Correspondence Address	Don M. Obert Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES mlk@cll.com, dmo@cll.com, trademark@cll.com, jmn@cll.com
Submission	Motion for Default Judgment
Filer's Name	Don M. Obert
Filer's e-mail	mlk@cll.com, dmo@cll.com, jmn@cll.com, trademark@cll.com
Signature	/Don M. Obert/
Date	12/30/2014
Attachments	BROOKLYN CRESCENTS LACROSSE; Opp. No. 91216349 Mot Default 12302014.pdf(6162 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 85/963,523

Filed: June 18, 2013

For Marks: BROOKLYN CRESCENTS LACROSSE (Stylized)

Published in the Official Gazette: November 12, 2013

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LOS ANGELES DODGERS LLC,	:	
	:	
Opposer,	:	
	:	
v.	:	Opposition No. 91216349
	:	
BROOKLYN CRESCENTS ATHLETICS, INC.,	:	
	:	
Applicant.	:	
	:	
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Commissioner for Trademarks  
Attn: Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

**MOTION FOR DEFAULT JUDGMENT**

**MOTION**

Pursuant to Trademark Rule 2.106(a), Opposer hereby moves for a default judgment in this proceeding because Applicant has failed to file a timely answer. In the alternative, should this proceeding be reopened, Opposer requests that the discovery and trial periods be reset.

**MEMORANDUM**

Opposer's motion for default judgment should be granted because Applicant has failed to submit an answer to the Notice of Opposition. The order instituting this opposition was mailed by the Board on May 12, 2014. On August 19, 2014, the Board issued an Order in response to the parties' Motion for Suspension for Settlement With Consent of same date, resetting, among

other things, Applicant's deadline to file and answer to the Notice of Opposition to December 18, 2014. As the answer was due December 18, 2014 and no answer has been filed or received, and no good cause shown, a default judgment should be entered.

In the event, however, that this proceeding is reopened, Opposer requests that the discovery and trial periods be reset.

Dated: New York, New York  
December 30, 2014

Respectfully submitted,

COWAN LIEBOWITZ & LATMAN, P.C.  
Attorneys for Opposer

By: /Don M. Obert/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on December 30, 2014 a true and correct copy of the foregoing Motion for Default Judgment to be sent via First Class Mail, postage prepaid, to Applicant's Attorney and Correspondent of Record, Charles Austin, Esq., The Austin Law Firm, P.C., 204 Taylor St. Fl. 2, Orange, NJ 07050-3412.

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/Don M. Obert/  
Don M. Obert